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Attorneys for Plaintiffs
ROSEMARY ELORREAGA, et al.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ROSEMARY ELORREAGA, individually and
as Successor-in-Interest to ROBERTO
ELORREAGA; ROBERT PAUL
ELORREAGA; RICHARD ANDREW
ELORREAGA, and RONALD EDWARD
ELORREAGA,

Plaintiffs,

vs.

ABB, INC., et al.,

Defendants.

Case No: 4:2-cv-05696-HSG

**STIPULATION AND ORDER TO
EXTEND FACT DISCOVERY CUT-
OFF TO TAKE THE DEPOSITION OF
EXPERT SHELDON RABINOVITZ**

Judge: Hon. Haywood S. Gilliam, Jr.

Complaint Filed: September 23, 2020

Date Removed: July 26, 2021

Trial: October 31, 2022

TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:

Plaintiffs sought the deposition of Defendant Air & Liquid Systems, Inc., Successor-by -
Merger to Buffalo Pumps' ("Buffalo Pumps") expert Sheldon Rabinowitz to take place before

1 the expert discovery deadline in this matter, but due to scheduling issues it cannot be taken until
2 June 10, 2022. Plaintiffs and Defendant Buffalo Pumps, et al. stipulate that the deposition of
3 Sheldon Rabinovitz can take place after the June 8, 2022, expert discovery cutoff. The extension
4 applies only to the deposition of Sheldon Rabinovitz pursuant to FRCP 30(b)(6). This extension
5 will not impact other deadlines in the Scheduling Order.

6
7 Dated: June 3, 2022

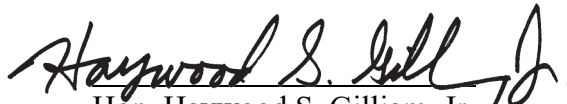
8 /s/H.W. Trey Jones
9 H.W. Trey Jones
Attorneys for Plaintiffs

10 Dated: June 3, 2022

11 /s/ James G. Scadden
12 James G. Scadden
Attorney for Air & Liquid Systems Corp.

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17 **IT IS SO ORDERED.**

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19 Dated: June 7, 2022

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21 Hon. Haywood S. Gilliam, Jr.
U.S. District Court Judge